

Honorable Theresa L. Fricke

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

CALEB JESSE CHAPMAN

Defendants.

CASE NO. 3:21-mj-05185

COMPLAINT for VIOLATION
18 U.S.C. § 113(a)(4)

BEFORE the Honorable Theresa L. Fricke, United States Magistrate Judge,
Tacoma, Washington.

The undersigned complainant being duly sworn states:

COUNT 1
(Assault by Striking, Beating or Wounding)

On or about August 29, 2021, within the Western District of Washington, the
defendant, CALEB JESSE CHAPMAN, committed an assault within the territorial
jurisdiction of the United States by striking, beating, and wounding another individual,
A.J.

All in violation of Title 18, United States Code, Section 113(a)(4).

//
//

COMPLAINT/CHAPMAN - 1

UNITED STATES ATTORNEY
1201 PACIFIC AVENUE, SUITE 700
TACOMA, WASHINGTON 98402
(253) 428-3800

1 The undersigned complainant being duly sworn further states:

2 **AFFIANT BACKGROUND**

3 1. I, Spencer Walker, am a Special Agent ("SA") with the Federal Bureau of
4 Investigation ("FBI") and have been so employed since February 2009, both domestically
5 and internationally. Before joining the FBI, I obtained a bachelor's degree and master's
6 degree in Accounting from Brigham Young University and worked for a major public
7 accounting firm for four years. During my career I have investigated a variety of
8 violations of federal law, including complex crimes, crimes against children, and matters
9 involving national security. In addition to my investigative duties, I have served as a
10 member of the FBI Director's Protective Detail, a certified SWAT Operator, and an
11 instructor at the FBI Academy. I am also a firearms instructor, a tactics instructor, a
12 defensive tactics instructor, a physical fitness advisor.

13 2. I am currently assigned to the Seattle Division, Tacoma Resident Agency
14 criminal squad. As an FBI Special Agent, I have been trained to investigate a variety of
15 crimes, including cases involving assault. In this capacity, I investigate, *inter alia*,
16 violations of Title 18, United States Code, Section 113 *et seq.*, and related offenses.

17 3. The statements contained in this affidavit are based upon my investigation
18 and information provided to me by others familiar with this matter, including other law
19 enforcement officers. I have not included each and every fact known to me or other
20 investigative personnel concerning this investigation. I have set forth only the facts I
21 believe are necessary to establish probable cause to believe that CALEB JESSE
22 CHAPMAN committed the crime of Assault by Striking, Beating or Wounding in
23 violation of Title 18, United States Code, Section 113(a)(4).

24 **SUMMARY OF PROBABLE CAUSE**

25 4. On August 29, 2021, A.J. was interviewed by the FBI. A.J. told agents that
26 sometime after midnight on August 29, 2021, CHAPMAN had been using
27 methamphetamine and began acting erratically. At approximately 2:00 a.m., after
28 dropping his kids off with his brother CHAPMAN and A.J. went to R.H.'s house to

1 deliver a note CHAPMAN had written. R.H. told investigators that the note discussed
2 CHAPMAN's grievances with the White House, his difficulty purchasing ammunition,
3 and his belief that an imminent revolution would be occurring within the next 30 days,
4 beginning in Texas and the Olympic Peninsula. During his interaction with CHAPMAN,
5 R.H. observed that CHAPMAN was armed with an AR-15 and a handgun, which
6 CHAPMAN had concealed in his rear waistband.

7 5. After speaking with R.H. and delivering his note to at least one other
8 personal acquaintance, CHAPMAN and A.J. drove to the Deer Park campground
9 (hereinafter "the Campground") in the Olympic National Park in a white F-250. The
10 Campground is within the territorial jurisdiction of the United States. On their way to the
11 campground CHAPMAN stopped the truck and walked into the woods. Shortly
12 thereafter A.J. observed embers from a fire observable from CHAPMAN's location.
13 Upon his return to the truck, CHAPMAN smelled of gasoline.

14 6. At approximately 6:00 a.m, A.J. and CHAPMAN arrived at the
15 Campground.¹ According to A.J., she observed that CHAPMAN became very upset once
16 they arrived. CHAPMAN told A.J. that she was going to die because of the "revolution."
17 CHAPMAN then made suicidal comments about himself, including telling A.J. that he
18 was never going to see his children again. While arguing with A.J., CHAPMAN threw a
19 soup can at A.J., hitting her and causing a laceration to her leg. CHAPMAN proceeded
20 to grab A.J. by the head and hit her head repeatedly against the car seat while telling A.J.
21 to "shut up." A.J. then observed CHAPMAN leave the Campground and walk into the
22 woods while yelling and screaming. A.J. stated that she observed that when CHAPMAN
23 left the Campground, he was wearing a black colored tactical vest, a sleeveless shirt,
24 jeans and was armed with a semi-automatic rifle, a shotgun, and multiple handguns.

25 7. A.J. told agents that CHAPMAN had been talking about a "revolution" and
26 he believes that there is going to be an armed conflict with the government. A.J. told
27

28 ¹ While at the Campground, a witness, D.R., interacted with A.J. and CHAPMAN. D.R. told investigators that it appeared as if A.J. was "strung out," indicating that she might be under the influence of drugs.

1 investigators that she does not believe that CHAPMAN will harm the public but believes
2 he will act violently towards law enforcement if he feels threatened. A.J. also believes
3 that CHAPMAN has additional methamphetamine in his possession. During the
4 investigation, a Park Ranger observed a laceration on A.J.'s leg.

5 **CONCLUSION**

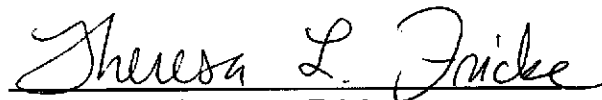
6 15. Based on the above facts, I respectfully submit that there is probable cause
7 to believe that CALEB JESSE CHAPMAN committed the crime of Assault by Striking,
8 Beating or Wounding, in violation of Title 18, United States Code, Section 113(a)(4)
9 within the Olympic National Forest.

10 
11

12 Spencer B. Walker, Complainant
13 Special Agent, FBI

14 Based on the Complaint and Affidavit sworn to before me telephonically, the
15 Court hereby finds that there is probable cause to believe the Defendant, CALEB JESSE
16 CHAPMAN, committed the crime of Assault by Striking, Beating or Wounding, in
17 violation of Title 18, United States Code, Section 113(a)(4).

18
19 Dated this 1ST day of September, 2021.

20
21 
22

23 Honorable Theresa L. Fricke
24 United States Magistrate Judge
25
26
27
28